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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:  
  
GIGA WATT, Inc., a Washington  
corporation,  
  
Debtor.

Case No. 18-03197 FPC 11  
  
The Honorable Frederick P. Corbit  
  
Chapter 7

MARK D. WALDRON, as Chapter 7  
Trustee,  
  
Plaintiff,  
  
vs.  
  
PERKINS COIE LLP, a Washington  
limited liability partnership,  
LOWELL NESS, an individual and  
California resident, and TIMUR  
USMANOV, an individual and  
Russian citizen,  
  
Defendants.

Adv. Case No. 20-80031  
  
**EGAN DECLARATION IN  
SUPPORT OF TRUSTEE'S  
MOTION TO DISMISS THIRD-  
AMENDED COMPLAINT FOR  
MISJOINDER**

I, Pamela M. Egan, declare as follows:

1. I submit this declaration in support of the *Trustee's Motion to Dismiss Third-Party Complaint for Misjoinder* ("Motion"), filed herewith. Unless otherwise defined herein, capitalized terms used in this Declaration have the meanings ascribed to them in the Motion.

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2. My law firm, Potomac Law Group PLLC (“PLG”), is counsel to the Trustee. I am a partner in PLG.

3. The statements set forth herein are based on my personal knowledge or my review of the books and records of Giga Watt, Inc. (“Giga Watt” or “Debtor”). If called as a witness, I would and could competently testify thereto.

1. A true and correct copy of the *Class Action Complaint*, filed in the United States District for the Eastern District of Washington (“District Court”) on December 16, 2020, Case No. 2:20-cv-00464-SAB, ECF No. 1, is attached as Exhibit 1 to the Request for Judicial Notice, filed herewith, in support of the Motion.

2. A true and correct copy of the *Order Cancelling Status Conference; Striking Motions; Staying Case*, filed in the District Court on August 1, 2022, Case No. 2:21-cv-00291-SAB, ECF No. 56, is attached as Exhibit 2 to the Request for Judicial Notice, filed herewith, in support of the Motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of December 2022 in Seattle, Washington.

*s/ Pamela M. Egan*  
Pamela M. Egan